

**Local Education Agency Medi-Cal Billing Option Program
Ad Hoc Workgroup Meeting
December 5, 2012 Meeting Minutes**

Location: Natomas Unified School District (USD)

1.	Geri Baucom	DHCS, Safety Net Financing Division (SNFD)
2.	Rick Record	DHCS, SNFD
3.	Cheryl Ward	DHCS, SNFD
4.	Angelia Johnson	DHCS, SNFD
5.	Renzo Bernales	CDE, Special Education Department
6.	Alan Eng	DHCS, A&I Financial Audits Branch (FAB)
7.	Martin Alvarez	DHCS, A&I FAB
8.	Vongayi Chitambira	DHCS, A&I FAB
9.	Cori Miglietto	DHCS, A&I FAB
10.	Anysia Drumheller	Butte COE
11.	Michelle Cowart	Contra Costa COE
12.	Sherry Purcell	Los Angeles USD
13.	Margie Bobe	Los Angeles USD
14.	Dr. Lisa Test	Los Angeles USD (via conference call)
15.	Kim Hopko	Los Angeles COE
16.	Laura Baynham	Mendocino COE
17.	Tracy Cole	Natomas USD
18.	Jeremy Ford	Oakland USD
19.	Cathy Bennett	Sacramento City USD
20.	Marlene Burrue	San Joaquin COE
21.	Greg Englar	Sonoma COE
22.	Janice Holden	Stanislaus COE
23.	Kevin Harris	Navigant Consulting, Inc.
24.	Gloria Eng	Navigant Consulting, Inc.
25.	Kerry Chang	Navigant Consulting, Inc.

Handouts

Each participant was emailed an electronic copy of the following: Workgroup Meeting Agenda, October 2012 Meeting Minutes, October Breakout Session Summary and Results, December DHCS Status Update Summary, LEA Workgroup Breakout Group Instructions, Assistants and Aides State Regulations Summary, and the DHCS Telehealth Workgroup Implementation Plan for AB 415. In addition, copies of the maps summarizing states with School-Based Occupational Therapy, Physical Therapy, Speech Therapy and Audiology Assistants and Aides as well as guidelines and information related to Occupational Therapy and Physical Therapy assistants/aides from guest speaker Dr. Lisa Test were distributed to Workgroup members.

Purpose

The meeting was convened by DHCS. The purpose of the Workgroup is to improve the Local Educational Agency (LEA) Program. The emphasis of the meeting is to strategize various goals and activities aimed at enhancing the Medi-Cal services provided on

**Local Education Agency Medi-Cal Billing Option Program
Ad Hoc Workgroup Meeting
December 5, 2012 Meeting Minutes**

school sites and access by students to these services, while increasing federal reimbursement to LEAs for the cost of providing these services.

Review of Meeting Minutes

The Workgroup reviewed the October meeting minutes and the minutes were approved as written. The minutes will be posted on the LEA Program website.

California Department of Education (CDE) Updates

- AB 114 Workgroup has two remaining meetings scheduled for February and May 2013.
- CDE is developing an IEP training PowerPoint that will include five different modules to inform parents and other stakeholders of the process for developing and formulating student IEPs.
- CDE is continuing their efforts to change affected sections of regulations in Title 2 of the California Code of Regulations (which requires that CDE collaborate with other affected stated agencies), and Title 5 of the California Code of Regulations so that they are in alignment with AB 114.
- The Workgroup discussed confusion and misunderstanding in the LEA community around the definition of “mental health” services and what services may be reimbursable under the LEA Program.
- The Workgroup would like to further discuss the impact of AB 114 on the LEA Program.

Department of Health Care Services Audits & Investigations Updates

- FY 2006/07 CRCS audit update: A&I has completed and issued 396 15-day letters and 275 audit reports. They are continuing to issue letters and reports for FY 2006/07 CRCS reports.
- FY 2007/08 CRCS audit update: A&I has completed and issued 208 15-day letters and 184 audit reports. They are continuing to issue letters and reports for FY 2007/08 CRCS reports.
- FY 2008/09 CRCS audit update: A&I is currently working on audits and 250 audits have been completed. A&I will be working to issue the 15-day letters and audit reports to LEAs.
- A&I has issued 458 audit reports to date. For many LEAs the FY 2006/07, FY 2007/08 and FY 2008/09 CRCS audit letters may be issued at the same time.
- A&I will be attending LEA Audit Report informal appeal hearings starting in January 2013.

**Local Education Agency Medi-Cal Billing Option Program
Ad Hoc Workgroup Meeting
December 5, 2012 Meeting Minutes**

- All Medicaid audit reports are public record, therefore, A&I will be eventually uploading CRCS audit reports to the A&I website. A link will be provided on the A&I LEA website and DHCS LEA Program website for LEAs to access.
- The Workgroup also discussed the A&I Quarter 1 audit activities report for LEA expenditures for A&I.
- The Workgroup discussed the original negotiated A&I FTE positions and A&I will compile a budget to determine if changes to the A&I withhold percentage are necessary.

DHCS SNFD Status Updates

2011/12 PPA / 2010/11 Annual Report Process

- DHCS has received 500 PPA/Annual Reports to date. Of these, 31 require corrections and 20 are new program LEAs. 43 PPA/Annual Reports have yet to be submitted.

FY 2010/11 CRCS

- CRCS Supplemental Document (for general and new LEA staff training purposes).
 - LEAs were notified in an e-blast on 11/1/12 that the CRCS PowerPoint, "FY 2011-11 CRCS Training Supplement," is now posted on the LEA Program website at [http://www.dhcs.ca.gov/provgovpart/Pages/CostandReimbursementComparisonSchedule\(CRCS\)forFiscalYear2010-11.aspx](http://www.dhcs.ca.gov/provgovpart/Pages/CostandReimbursementComparisonSchedule(CRCS)forFiscalYear2010-11.aspx).
 - Information includes: FY 2010/11 CRCS form flow, calculations and sample documentation.
- The CRCS IRUS Report was posted on the LEA Program website on 10/12/12 and is available for download.

LEA Provider Manual PDF

- In January 2013 the LEA Provider Manual will be available as a searchable PDF document on the LEA website.

RAD Code 9921/9922 (Annual Assessment) EPC

- Phase 2 (dates of service 7/1/09 – 6/30/10)
 - DHCS is working with Information Technology Management Branch (ITMB) and Xerox to expedite – implementation date to be determined.

FY 2011/12 Rate Inflation EPC

- DHCS is working with ITMB and Xerox to expedite – implementation date to be determined.

**Local Education Agency Medi-Cal Billing Option Program
Ad Hoc Workgroup Meeting
December 5, 2012 Meeting Minutes**

TCM Claims Denied with RAD Code 033 – “The recipient is not eligible for the special program billed and/or restricted services billed”

- OIL Amendment 062-12 was implemented 10/18/12 exempting LEAs from TCM claim denials.
 - LEA TCM claims should no longer be denying with RAD CODE 033.
- EPC required to reprocess denied TCM claims – implementation date to be determined.

A&I 1% Withhold

- This withhold was initiated with the 8/27/12 check-write.
- DHCS is tracking the withhold collected (not to exceed \$650,000).

SB 231 2.5% Withhold

- DHCS is tracking the paid claims reimbursement before implementing the 2.5% withhold.
- DHCS projects that 2.5% withhold \$60,000,000 base will be reached as of the 12/17/12 check-write.

Conversion to 5010 Electronic Claim Submission

- 12/31/12 is the last day current standards for electronic claims submissions will be accepted.
- As of 1/1/13 all HIPAA covered entities must be compliant with Version 5010
- Line Item Control Numbers (LCN) not included on return file: This is a known issue with the Office of HIPAA Compliance (issue 51). HIPAA Compliance needs to issue a policy memo instructing Xerox to include LCN on output. ITMB is checking progress.
- For more information:
 - http://files.medi-cal.ca.gov/pubsdoco/hipaa/articles/hipaanews_20048.asp
 - http://files.medi-cal.ca.gov/pubsdoco/hipaa/hipaa_5010_home.asp

Definition of Billing Consortium as related to PPA/AR, CRCS and DUA

- An LEA billing consortium is when more than one LEA bills under the same NPI. The NPI listed on the PPA/AR will be the LEA responsible for the billing and reports for the LEA consortium. Example:
 - LEA Name - LEA School District/COE, NPI-1234567890, EIN- 95-0000000.
 - All of LEA School District/COE information will go on the Medi-Cal Provider Enrollment Information Page and the address and CDS Code for LEA 1, LEA 2, and LEA 3 will go on the Consortium Billing Page. The EIN for LEA 1, LEA 2, and LEA 3 is not required on the provider enrollment information sheet or the consortium page.).
 - Individual schools within a school district do not need to be included on the Consortium Billing Page.
- DHCS will post the definition of Billing Consortium on the LEA Website FAQs and will follow up with individual LEAs who need clarification.

**Local Education Agency Medi-Cal Billing Option Program
Ad Hoc Workgroup Meeting
December 5, 2012 Meeting Minutes**

Clarification of Credentialed School Nurse

- Can a practitioner with a Preliminary School Nurse Services Credential be a qualified rendering practitioner under the LEA Medi-Cal Billing Option Program?
 - Yes. A Registered Credentialed School Nurse includes the Preliminary School Nurse Services Credential and the Professional Clear School Nurse Services Credential. A Preliminary School Nurse Services Credential is considered a valid school nurse services credential and does not require supervision to provide nursing services.
- DHCS will post this Q&A on the LEA Website FAQs.

Data Use Agreement (DUA) & Tape Match Revisions

- Approximately 400 DUAs have been received.
- DHCS sent an LEA e-blast on 11/16/12 announcing that the LEA Tape Match Record Layout is posted on the LEA website at <http://www.dhcs.ca.gov/provgovpart/Pages/DataUseAgreement.aspx>.
- DHCS sent an SMAA e-blast on 11/16/12 stating if an LEA participates only in the SMAA program and uses the tape match only for the SMAA program they are not required to submit a DUA (LEA may not use tape match ordered for the SMAA program for any other purpose). It also informed of the revised LEA Match Record Layout.
- Tape Match Revisions were completed and tested in November 2012.
 - DHCS is working with Sacramento City USD to test the Tape Match and the eligibility percentages before and after the updates to the Tape Match.
- The Workgroup discussed having Workgroup members document issues or create additional guidance and documentation that may assist LEAs with the DUA and Tape Match revisions, as necessary.

CMS 6028 (NPI Numbers for Ordering & Referring Providers)

- DHCS is preparing a position statement to submit to PED exempting the LEA Billing Option Program from the requirement that ordering and referring practitioners providing Medicaid services obtain a NPI and be enrolled as a participating provider.
- DHCS is preparing an application fee waiver request to submit to PED
- PED's projected schedule:
 - 12/1/12: Issue Provider Bulletins
 - 1/1/13: Implement Provider Bulletin

AB 2608

- DHCS discussed the short-term, mid-term and long-term AB 2608 timeline and work plan.
 - DHCS is preparing a PPL providing guidance regarding LEA Medical Transportation to be released January 2013.
 - DHCS will update the LEA Provider Manual, post FAQs and send an e-blast after the PPL is issued.

**Local Education Agency Medi-Cal Billing Option Program
Ad Hoc Workgroup Meeting
December 5, 2012 Meeting Minutes**

- DHCS will determine the methodology to collect the fair share of withholds from each LEA that will accurately collect the maximum amounts for the A&I and SB 231 withholds.
- Additionally, DHCS will work with ITMB to develop a quarterly report to identify the withholds by LEA.

Telehealth

- DHCS e-mailed the Telehealth survey to LEAs on 11/28/12 and requested LEAs respond by 12/7/12.
 - NCI/DHCS are compiling survey responses to evaluate interest and feasibility of implementing Telehealth practices within their schools.
 - NCI/DHCS reviewed the summary of results from the Telehealth survey responses received to date.
- DHCS will consult with stakeholders to determine which LEA services may be appropriate to conduct via Telehealth.
- DHCS has prepared an implementation action plan for AB 415.

Assistants/Aides

- DHCS/NCI compiled research to further define the differences between assistants and aides in scope of practice and supervision requirements.
- The Workgroup reviewed and discussed the Assistants and Aides State Regulations Summary, which includes qualifications, supervision requirements and scope of practice for assistants and aides.
- In addition, DHCS/NCI developed maps to summarize their research findings on other states school-based programs and identified states that reimburse for Occupational Therapy, Physical Therapy, Speech Therapy and/or Audiology Assistants and Aides.

DHCS /Navigant Consulting Update

- NCI recapped the recommendations and results of the October 2012 breakout session summary and provided a brief update on the status of practitioner assistants and aides and AB 2608 transportation.
- NCI also provided a brief overview of the post-election implications of the Affordable Care Act.

Workgroup Breakout Sessions

The goal of the Workgroup breakout sessions is to brainstorm challenges and barriers in smaller workgroups, and use the combined expertise to provide guidance to DHCS and suggest planning and solutions.

- Workgroup members split into four groups to discuss two topics: 1) Defining the roles and practical use of Physical Therapy, Occupational Therapy, Speech-

**Local Education Agency Medi-Cal Billing Option Program
Ad Hoc Workgroup Meeting
December 5, 2012 Meeting Minutes**

Language Pathology and Audiology Assistants/Aides in schools and 2) Refining ideas to implement Telehealth in California school-based settings, including types of LEA services that could be conducted via Telehealth and identifying specific allowable practitioner(s). Guest speaker Dr. Lisa Test, OTD, OTR/L provided an overview of Occupational and Physical Therapy assistants and aides to the Workgroup and provided context for the breakout sessions.

- Each group was provided a flip chart and pens to document their problem statement, issue and solutions. The groups then presented their statements and recommendations to the larger group. DHCS will review the information and recommendations and address, as appropriate.

Los Angeles Unified School District – Dr. Lisa Test, OTD, OTR/L

- In prior Workgroup meetings, the Workgroup had discussed expanding the LEA Program and reimbursement by increasing LEA practitioners to include therapy assistants and aides that are qualified to bill in the LEA Billing Option Program.
- DHCS and NCI recommended that professional representation from practitioners or associations is necessary to provide insight and expertise to supplement internal research on assistants and aides in LEAs.
- Dr. Lisa Test was invited to present information on the use of occupational therapy and physical therapy assistants in schools. In addition, Dr. Test noted the recent California Board of Occupational Therapy Telehealth proposed regulations package.

Next Meeting

- Wednesday, February 6, 2013 10:30am-4:00pm at Natomas USD